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MEATHEAD MOVERS, INC.

8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

11
12 U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

13 Plaintiff,

14 v.

15 MEATHEAD MOVERS, INC., and
16 DOES 1-10, inclusive,

17 Defendants.

CASE NO. 2:23-cv-08177-DSF-AGR
DECLARATION OF ANGELA
DEKHTYAR IN SUPPORT OF
DEFENDANT MEATHEAD
MOVERS, INC.'S OPPOSITION TO
PLAINTIFF U.S. EEOC'S MOTION
FOR BIFURCATION OF
DISCOVERY & TRIAL

Assigned to the Hon. Dale S. Fischer
and Magistrate Judge Alicia G.
Rosenberg

DECLARATION OF ANGELA DEKHTYAR

I, Angela Dekhtyar, declare as follows:

1. I am the General Manager and Strategic Assistant to the Chief Executive Officer of Meathead Movers, Inc. (“Meathead Movers”), the Defendant in the above-entitled action. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein. I make this declaration in support of Meathead Movers’ Opposition to Plaintiff U.S. EEOC’s Motion for Bifurcation of Discovery & Trial.

2. I have worked at Meathead Movers with the EEOC for 17 years.

3. Meathead Movers is a professional moving and relocation services company for residential and commercial clients. It provides on-site, short distance, and long distance packing and moving services.

4. Meathead Movers was founded in 1997 by brothers Aaron and Evan Steed. Aaron and Evan were high school students at the time and were having difficulty finding jobs that worked with their school and sport schedules. As a result, they started their own moving company and hired fellow students. Aaron is still the President and CEO.

5. The nature of Meathead Movers’ business tends to attract a young workforce because the majority of the job requires strenuous physical work for several hours. When loading or unloading the moving van, the laborers are required to jog when they are not carrying items; Meathead Movers promotes itself as “the jogging movers” and thus, requires its employees to live up to that reputation. The “jogging movers” concept is popular with customers since fees are based on the hours the move is estimated to cost, so jogging movers convey a minimization of cost to the customer.

6. A high percentage of the job openings are for laborers who perform the moving, lifting and carrying.

7. With respect to the office or management positions, Meathead Movers

1 prefers to promote from within instead of hiring from outside the company. Thus,
2 most of the office and management positions at the Headquarters and branch
3 locations are filled by employees who were promoted from the laborer position.

4 8. As a small business, Meathead Movers has traditionally outsourced
5 more senior, learned functions like human resources, accounting, payroll, and
6 marketing to third party companies or consultants.

7 9. Meathead Movers is regulated by the State and, therefore, must follow
8 strict rules regarding who it employs. Applicants are required to pass a background
9 check as a condition of employment.

10 10. I assisted Meathead Movers in responding to Plaintiff the U.S. Equal
11 Employment Opportunity Commission (“EEOC”)’s investigation, which began in
12 2017.

13 11. During the investigation, Meathead Movers repeatedly requested
14 information from the EEOC regarding the individuals who the agency believed were
15 the victims of discrimination.

16 12. The EEOC would not provide this information to Meathead Movers on
17 the grounds that its investigative file is not disclosed during the pendency of the
18 EEOC’s federal investigation.

19 13. Meathead Movers is a small business and has already devoted
20 significant resources and costs to responding to the EEOC’s investigation, and now
21 this case. Meathead Movers would be adversely affected by having to pay the fees
22 and costs associated with preparing multiple motions and trials.

23 14. Meathead Movers has a strong interest in resolving this litigation as
24 quickly as possible.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed on this 8th day of April, 2024, at Los Angeles, California.

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7 Angela Dekhtyar

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